



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

New Bedford
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51839

August 14, 1985

James Walsh, Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Transportation System Center
55 Broadway 10th Floor
Cambridge, MA 02142

Dear Mr. Walsh:

In accordance with our authority under Section 309 of the Clean Air Act, Section 404 of the Clean Water Act, and the National Environmental Policy Act, we have reviewed the Revised Environmental Assessment (EA) for the Replacement of the New Bedford/Fairhaven Bridge, Route 6 Over New Bedford-Fairhaven Harbor, Massachusetts; and Federal Highway Administration's Finding of No Significant Impact (FONSI) for Replacement of the New Bedford-Fairhaven Bridge.

EPA submitted comments to FHWA on February 4, 1983, concerning the Draft EA for the proposed bridge replacement. As stated in our earlier comments, EPA believes that sufficient information has not been presented in the EA to adequately address the proposed project or the potential environmental and public health effects. Significant deficiencies that remain to be addressed include: the lack of information and quantification of dredging impacts, including the resuspension of contaminants in the water column; the absence of a selected disposal option and site for 17,000 cubic yards of dredge material contaminated with polychlorinated biphenyls (PCB's); the lack of an assessment to address impacts from the dewatering operations (cofferdam dewatering and dredge material dewatering); and a full discussion of proposed treatment necessary to treat runoff/leachate from the disposal site.

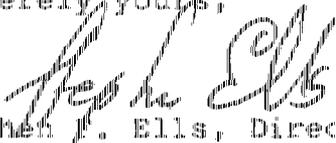
EPA recognizes the importance of this project, including the environmental benefits that would result upon completion of the bridge. We believe that the replacement of the New Bedford-Fairhaven bridge could be constructed in a manner that will result in acceptable environmental impacts. However, without the information summarized above, EPA cannot evaluate the impacts of the proposal in its present form. Moreover, EPA has not yet completed its Remedial Investigation/Feasibility Study (RI/FS) for New Bedford Harbor, so EPA cannot make any judgements about the problems being investigated, which include contaminant resuspension and disposal site design.

We recognize that the design of the new double leaf bascule span bridge will take in excess of two years. This time interval could allow EPA's RI/FS for the New Bedford Harbor to be completed; for specific boundaries for channel dredging to be better identified; and for appropriate testing such as elutriate, modified elutriate, settling, and column tests to be conducted as required for the Section 404 permit application. Thus, EPA should be in a better position to evaluate the impacts of this project upon the completion of the Section 404 permit application, when permit conditions for dredging and disposal operations can be developed; and Best Available Control Technology can be defined. Close project coordination among federal and state agencies during the 404 permit application process could insure that existing deficiencies can be resolved expeditiously and that no environmentally unacceptable impacts will occur.

We request that you contact Donald Cooke, of my staff, to establish a schedule of regular meetings to address not only the progress of the bridge replacement project, but also the progress of EPA's Remedial Investigation/Feasibility Study for the New Bedford Harbor Superfund project. Mr. Cooke may be reached at 617/223-1739.

Thank you for the opportunity to review the EA/PONSI for the Route 6 New Bedford/Fairhaven Bridge Replacement Project. We look forward to working with you in the coordination of the bridge project to protect the harbor from existing PCBs contamination.

Sincerely yours,



Stephen J. Ellis, Director
Office of Government Relations
and Environmental Review (RGR-2203)

cc: Philip Robinson, MA FHWA
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